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**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE DISTRICT OF OREGON**

**LAURA HANSON,**

Plaintiff,

v.

**STATE OF OREGON LEGISLATIVE  
ASSEMBLY,**

Defendant.

Case No. 3:21-CV-00780-SI

**PLAINTIFF'S REPLY IN SUPPORT OF  
PLAINTIFF'S MOTION *IN LIMINE***

**I. Plaintiff's Motion in Limine to Ask Leading Questions in the Direct Examination of Sara Gelser-Blouin, Kham Pham, Jessica Knieling, and Jackie Sandmeyer.**

Defendant's argument that "Plaintiff provides not one scintilla of factual support that, for any of these four, let alone all of these four, they would respond in a hostile manner to any

questioning and not respond fully and truthfully” misses the mark of the Fed. R. Evid. 611(c) and Plaintiff’s argument in support of her motion. All four parties are “witnesses identified with an adverse party” and Plaintiff is entitled to ask leading questions pursuant to Fed. R. Evid. 611(c)(2).

**II. Plaintiff’s Motion in Limine to Exclude Improper Evidence, Argument, or Reference of Character.**

Defendant argues this motion is premature, however, several of the witnesses on Defendant’s witness list have been identified to testify only to the character of Sen Gelser-Blouin which is improper character evidence. See ECF No. 94 at 9-11, ECF No. 118 at 4-6. Thus, this motion is not premature and Plaintiff requests that improper evidence, argument, testimony, and witnesses who will only testify to character viz a viz past actions taken by Sen. Gelser-Blouin, be excluded.

Submitted this 25th Day of April, 2024.

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## CERTIFICATE OF SERVICE

I certify that on April 25, 2024, I served the foregoing **PLAINTIFF'S REPLY IN SUPPORT OF PLAINTIFF'S MOTION *IN LIMINE*** upon the parties hereto via electronic means through the Court's Case Management/Electronic Case File system and via electronic mail:

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